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 1              IN THE UNITED STATES DISTRICT COURT
                  FOR THE DISTRICT OF COLUMBIA
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                                    )
 3   STATE OF TEXAS,                )
                                    )
 4      Plaintiff,                  )
                                    )
 5                                  )
     VS.                            )
 6                                  ) CASE NO:  1:11-CV-00128
                                    ) RMC-DST-RLW
 7   ERIC H. HOLDER, JR., IN        )
     HIS OFFICIAL CAPACITY AS       )
 8   ATTORNEY GENERAL OF THE        )
     UNITED STATES,                 )
 9                                  )
        Defendant,                  )
10                                  )
                                    )
11   ERIC KENNIE, ET AL.,           )
                                    )
12      Defendant-Intervenors,      )
                                    )
13                                  )
     TEXAS STATE CONFERENCE OF      )
14   NAACP BRANCHES, ET AL.,        )
                                    )
15      Defendant-Intervenors,      )
                                    )
16                                  )
     TEXAS LEAGUE OF YOUNG          )
17   VOTERS EDUCATION FUND, ET      )
     AL.,                           )
18                                  )
        Defendant-Intervenors,      )
19                                  )
     TEXAS LEGISLATIVE BLACK        )
20   CAUCUS, ET AL.,                )
                                    )
21      Defendant-Intervenors,      )
                                    )
22   VICTORIA RODRIGUEZ, ET         )
     AL.,                           )
23                                  )
        Defendant-Intervenors.      )
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STATE OF TEXAS VS. ERIC H. HOLDER, JR., ET AL.
Gloria Martinez on 04/17/2012

1:11-CV-00128
Pages 2..5

Page 2

1   **

2   ORAL DEPOSITION OF

3   GLORIA MARTINEZ

4   APRIL 17, 2012

5   **

6   ORAL DEPOSITION OF GLORIA MARTINEZ, produced as a

7   witness at the instance of the Defendant Intervenors Texas

8   State Conference of NAACP Branches and the Mexican

9   American Legislative Caucus of the Texas House of

10 Representatives, and duly sworn, was taken in the

11 above-styled and numbered cause on Tuesday, April 17,

12 2012, from 1:24 p.m. to 2:57 p.m., via telephone, before

13 Tamara K. Chapman, CSR in and for the State of Texas,

14 reported by machine shorthand, at the State House, 209

15 West 14th Street, Ground Floor, Austin, Texas, pursuant to

16 the Federal Rules of Civil Procedure and the provisions

17 stated on the record or attached hereto.

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22

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Page 3

1   A P P E A R A N C E S

2

3   FOR THE PLAINTIFF STATE OF TEXAS:
        Mr. Patrick Sweeten
4   Mr. Reynolds Brissenden
        ATTORNEY GENERAL OF TEXAS
5   Civil Medicaid Fraud Division
        300 W. 15th Street
6   Austin, Texas
        patrick.sweeten@oag.state.tx.us
7   reynolds.brissenden@oag.state.tx.us

8

9   FOR TEXAS NAACP STATE CONFERENCE AND THE MEXICAN AMERICAN
    LEGISLATIVE CAUCUS:
10   Ms. Myrna Pérez (telephonically)
        BRENNAN CENTER FOR JUSTICE AT NYU SCHOOL OF LAW
11   161 Avenue of the Americas, 12th Floor
        New York, New York 10013
12   myrna.perez@nyu.edu

13

14 FOR THE DEFENDANT ERIC H. HOLDER, JR., IN HIS OFFICIAL
    CAPACITY AS ATTORNEY GENERAL OF THE UNITED STATES:
15   Ms. Elizabeth S. Westfall (telephonically)
        Mr. Daniel J. Freeman (telephonically)
16   U.S. DEPARTMENT OF JUSTICE
        Voting Section, Civil Rights Division
17   950 Pennsylvania Ave. NW, NWB Room 7202
        Washington, DC 20530
18   elizabeth.westfall@usdoj.gov
        daniel.freeman@usdoj.gov

19

20
    FOR DEFENDANT INTERVENORS TEXAS STATE CONFERENCE OF NAACP
21 BRANCHES AND THE MEXICAN AMERICAN LEGISLATIVE CAUCUS OF
    THE TEXAS HOUSE OF REPRESENTATIVES:
22   Mr. Ezra D. Rosenberg (telephonically)
        DECHERT, LLP
23   902 Carnegie Center, Suite 500
        Princeton, New Jersey 08540-6531
24   ezra.rosenberg@dechert.com

25

Page 4

1   FOR DEFENDANT INTERVENORS TEXAS STATE CONFERENCE OF NAACP
    BRANCHES AND THE MEXICAN AMERICAN LEGISLATIVE CAUCUS OF
2   THE TEXAS HOUSE OF REPRESENTATIVES (CONTINUED):

3   Ms. Lindsey Stelcen
        DECHERT, LLP
4   300 West 6th Street, Suite 2010
        Austin, Texas 78701
5   lindsey.stelcen@dechert.com

6

7   Mr. Robert Kengle (telephonically)
        Mr. Mark Posner (telephonically)
8   LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER THE LAW
        1401 New York Avenue, N.W., Suite 400
9   Washington, D.C. 20005
        bkengle@lawyerscommittee.org
        mposner@lawyerscommittee.org
10

11
    FOR THE TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND:
12   Mr. Gregory K. Johnson (telephonically)
        FRIED, FRANK, HARRIS, SHRIVER & JACOBSON LLP
13   801 17th Street NW,
        Washington, DC 20006
14   gregory.johnson@friedfrank.com

15

16 FOR THE DEPARTMENT OF PUBLIC SAFETY:
        Ms. Kathleen T. Murphy
17   TEXAS DEPARTMENT OF PUBLIC SAFETY
        Office of General Counsel
18   5805 N. Lamar Boulevard
        Austin, Texas 78773
19   kathleen.murphy@txdps.state.tx.us

20

21 FOR VICTOR RODRIGUEZ, NICOLE RODRIGUEZ, SOUTHWEST VOTER
    REGISTRATION EDUCATION PROJECT, MI FAMILIA VOTA EDUCATION
22 FUND:
        Ms. Nina Perales
23   MALDEF
        110 Broadway, Suite 300
24   San Antonio, Texas 78205
        nperales@maldef.org

25

Page 5

1   ALSO PRESENT:
        Ms. Laura Fleming, Paralegal (Dechert, LLP)
2

3   Mr. Russell Weaver (telephonically) - Social
    Scientist

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 7

 8                    *  *  *

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10

11                                        Page
     Exhibit 5................................  25
12       Voter Record Layout
     (No Bates - 1 page)
13

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 1             GLORIA MARTINEZ,
 2   having been first duly sworn, testified as follows:
 3                EXAMINATION
 4   BY MR. ROSENBERG:
 5       Q.  Good afternoon, Ms. Martinez, and thank you for
 6   coming to this deposition.  My name is Ezra Rosenberg.
 7   I'm a lawyer with a law firm called Dechert.  I represent
 8   Texas State Conference of NAACP Branches and the Mexican
 9   American Legislative Caucus in the case of Eric Holder --
10   or the State of Texas versus Eric Holder.
11          You're testifying here pursuant to a notice
12   called a 30(b)(6), and we'll talk about that in a few
13   minutes.  But I wanted to give you a couple of guidelines
14   initially.
15          And my first question to you is, have you ever
16   been deposed before?
17       A.  No.
18       Q.  Okay.  Well, then it's important for you to know
19   a couple of things.
20          First of all, as you already know, you're under
21   oath.  I'm going to be asking you questions and the court
22   reporter is going to be taking down your answers and
23   putting it into a book called a transcript that might be
24   used in this case down the road.
25          Do you understand that?
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 1       A.  Yes.
 2       Q.  Because of that, it's important that before you
 3   answer any question, you understand the question as posed.
 4   We're going to be dealing with some technical terms and I
 5   may misstate a term or two.  If you don't understand what
 6   I'm asking, please tell me and I'll try to clarify.  Okay?
 7       A.  Okay.
 8       Q.  And it's also important that you answer verbally,
 9   as you just said, because I can't see a shrug of the
10   holder and the court reporter can't take a nod of the
11   head.  Okay?
12       A.  Very well.
13       Q.  And if at any time you need to take break, just
14   let me know.  Typically these are done in the same room,
15   so this is a little odd because we'll be on telephone and
16   you're there, but we'll -- we'll try to muddle through
17   this.
18          Any questions of me before I begin?
19       A.  None that I can think of.
20       Q.  Okay.  Thank you.
21          First of all, can you tell me what your title is?
22       A.  Program Specialist I.
23       Q.  And which department or agency?
24       A.  In the elections division of the Texas Secretary
25   of State's office.
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 1       Q.  And how long have you been in that position?
 2       A.  Approximately six years.
 3       Q.  And before that, what position did you have?
 4       A.  I did not work at the Secretary of State's office
 5   before that.
 6       Q.  Okay.  Where did you work before that?
 7       A.  I was without work for approximately four months.
 8       Q.  And before that?
 9       A.  I worked for about five years at the Wake Forest
10   University Baptist Medical Center in North Carolina.
11       Q.  Winston-Salem, right?
12       A.  Yes.
13       Q.  And can you tell me what the duties of the
14   Program Specialist I are?
15       A.  It's basically customer service.  We answer
16   questions from the general public regarding voter
17   registration, and we help the county voter registrars or
18   county clerks or elections administrators with their
19   questions on the use of the T.E.A.M. program that stands
20   for Texas Election Administration Management.
21       Q.  And in the course of your duties, have you become
22   familiar with the voter registration database maintained
23   by the Secretary of State?
24       A.  I've become familiar with the data that's entered
25   into the database.
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1   Q. And when you answered my question that way, are
2 you differentiating your familiar -- familiarity of the
3 data that's entered from being familiar with the database
4 as a whole?
5   A. Correct.
6   Q. Do you have a familiar -- familiarity with the
7 database as a whole?
8   A. That's difficult for me to answer. I know about
9 the information that users input and that data gets stored
10 in the database. But I don't work with the database.
11   Q. Are you familiar with the fields of the voter
12 registration database?
13   A. I'm familiar with the fields in T.E.A.M., yes.
14   Q. And when you corrected me and said "fields in
15 T.E.A.M.," is there a difference between what you called
16 T.E.A.M. and the voter registration database?
17   A. I'm not familiar with what's in the actual
18 database. I don't know about the background workings of
19 it. I know about the user interface and entering the
20 information there.
21   Q. I'd like to show you what's been marked as
22 Intervenor's Exhibit No. 1, which is
23 "Defendant-Intervenor's Notice of Deposition of the State
24 of Texas Regarding Texas's Database System."
25   Is that --

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1   MR. ROSENBERG: Can someone give the --
2   A. She did.
3   MR. SWEETEN: Lindsey did.
4   MR. ROSENBERG: Okay. Thank you.
5   Q. (BY MR. ROSENBERG) Have you seen this document
6 before?
7   A. Yes.
8   Q. And turning your attention to Roman Numeral III
9 on Page 4, which says: Information contained in the
10 T.E.A.M. voter registration database.
11   I'd like to go through each of those. First of
12 all, I think you've already testified that you're familiar
13 with the information contained in the T.E.A.M. voter
14 registration database; is that correct?
15   A. I suppose if you're calling it a T.E.A.M.
16 database, but I would just call it a T.E.A.M. interface.
17   Q. Okay. Then I -- I think you're going to have to
18 educate me when you say -- when, again, you differentiate
19 between the T.E.A.M. interface as opposed to the T.E.A.M.
20 voter registration database.
21   A. Sure.
22   T.E.A.M. interface is the program that the users
23 go into to enter voter registration information. The
24 T.E.A.M. database is where that information is stored.
25   Q. So you're familiar with the T.E.A.M. interface,

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1 but not with the T.E.A.M. database?
2   A. Correct.
3   Q. Okay. Let's go down each of these subparts,
4 then. No. 1: The table/fields contained in the T.E.A.M.
5 database, and the contents of those tables and fields.
6   Are you the person at the Secretary of State's
7 office to answer questions concerning those?
8   MR. SWEETEN: Are -- you're asking her if
9 she's the best person equipped? Are -- I mean, we're
10 putting her up as a corporate representative on these
11 copies. So I think those are -- those are potentially
12 different things. She's a corporate representative.
13 She's here to answer questions about those seven topics.
14   MR. ROSENBERG: I'll rephrase my question.
15   Q. (BY MR. ROSENBERG) Are you familiar with
16 table/fields contained in the T.E.A.M. database and the
17 contents of those tables and fields?
18   A. I am familiar with the fields contained in
19 T.E.A.M. and the contents of the fields. I don't know
20 about all the tables in the background. I know that there
21 are tables in T.E.A.M., I don't know what tables you are
22 referring to.
23   Q. No. 2: How the T.E.A.M. database tracks voters
24 who move or whose voter registration otherwise changes.
25   Are you familiar with that?

Page 13

1   A. Yes.
2   Q. What's the nature of your familiarity?
3   A. I'm familiar with the rules and regulations that
4 the voter registrars have to follow. I'm familiar with
5 how those rules and regulations are used in T.E.A.M. to
6 track voters whose residence addresses change.
7   Q. Anything else?
8   A. That's about -- I think that covers it.
9   Q. And when you describe rules and regulations, are
10 those rules and regulations in writing?
11   A. Yes.
12   Q. Are they compiled in a single document?
13   A. Yes.
14   Q. And what's that document called?
15   A. The Texas Election Code.
16   Q. No. 3: How the T.E.A.M. database tracks whether
17 a voter registration is active or inactive, or whether a
18 person has just applied or has successfully registered.
19   Are you familiar with that information?
20   A. How it tracks it? How it tracks it? Depends on
21 what you mean for the word "how." I know that it does
22 track it. I know what it looks like when it's tracking
23 it. I know what the record looks like for a person that's
24 applied or who has successfully registered.
25   Q. Do you know where it gets the information for

STATE OF TEXAS VS. ERIC H. HOLDER, JR., ET AL. **1:11-CV-00128**
Gloria Martinez on 04/17/2012 **Pages 14..17**

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1 purposes of tracking?
2   A. I believe I can answer that, yes.
3   Q. Okay. Information in the T.E.A.M. database
4 relating to citizenship, are you familiar with that?
5   A. Yes, I'm familiar with that.
6   Q. Information in the T.E.A.M. database relating to
7 race or ethnicity, are you familiar with that?
8   A. I know about that.
9   Q. And what -- what -- what do you know about that?
10 What's the nature of your information about race or
11 ethnicity in the T.E.A.M. database?
12   A. That we don't gather that information.
13   Q. Is there any information in the T.E.A.M.
14 database, whether you gathered it or not, relating to race
15 or ethnicity?
16   A. I'm not sure what your question is. If we don't
17 gather the information.
18   Q. Well, that actually was only because of the way
19 you answered the question when you say "we don't gather
20 it." I wanted to know whether you had gathered it or not,
21 or if it was information that was there.
22   A. Well, we don't ask voters to give us any of that
23 information, therefore we don't have it to enter it into
24 the system, so we can't enter it into the database.
25   Q. No. 6: How information is gathered from

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1 individuals for the database.
2   Are you familiar with that?
3   A. Yes.
4   Q. And No. 7: The history of the T.E.A.M. voter
5 registration database and how it has changed over time.
6   A. Somewhat familiar with that.
7   Q. Is there anyone whom you know at the Secretary of
8 State's office who would be more familiar than you with
9 that?
10   A. Not -- I mean, it depends on how familiar you
11 want. We'd be talking about people that are no longer
12 working at the Secretary of State?
13   Q. No. At the Secretary of State's office now.
14   A. No. Right now, no.
15   Q. What -- I'm interested in the types of records
16 that are -- are captured by the database. And by that I
17 mean specifically, is it just information on voter
18 registrants, or is there information on other people than
19 voter registrants in the database?
20   A. I believe right now T.E.A.M. also covers jury
21 wheel information.
22   Q. And when you say "jury wheel information," what
23 do you mean by that?
24   A. There's a component in T.E.A.M. that aids county
25 workers who choose to use T.E.A.M. for that purpose. It

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1 aids them in selecting their juries. So we also have that
2 jury wheel information for the users to use.
3   Q. And do you know the -- is there a difference
4 between the data -- data that's used for jury wheel
5 purposes from the data that's used for voter registrant
6 purposes in the voter registration database?
7   A. Is there a difference? You want to know the
8 differences?
9   Q. Yes.
10   A. The jury wheel contains drivers, as well as
11 people with only Texas IDs that may not be registered to
12 vote. It also includes people who are registered to vote.
13 Whereas the voter registration database only contains
14 those that are registered to vote.
15   Q. And where does the T.E.A.M. gather the
16 information about people who are not registered to vote
17 from?
18   A. We get it in a file from DPS. It comes in once a
19 year.
20   Q. And that file is delivered specifically for the
21 purpose of giving jury wheel information to the T.E.A.M.
22 database?
23   A. Yes.
24   Q. Other than voter registrants and jury wheel
25 information, are there -- is there information about any

Page 17

1 other individuals in the T.E.A.M. database?
2   A. In it? No. I would say no.
3   Q. I'd like to return for a second here to the jury
4 wheel information. How do you -- are you able to put that
5 information into your -- into the T.E.A.M. database
6 without creating a lot of duplications?
7   A. There is a process to eliminate duplicates.
8   Q. And what is -- what is that process?
9   A. There's a matching process. Well -- it takes
10 into account the file of voters for that county. So we do
11 it county by county. And it takes into account the DPS
12 file for people belonging to that county. And we also do
13 check with a file that we receive from the Texas Bureau of
14 Vital Statistics to eliminate deaths, people that have
15 passed away.
16   When we -- and part of the process, we compare
17 the names from the DPS file to the names in the voter
18 registration file. And those that are a strong match, we
19 will eliminate the DPS record, let's say, from the wheel,
20 keeping only one , the voter registration record and
21 therefore eliminating those duplicates.
22   Q. And what -- what criteria do you use to determine
23 whether something's a strong match?
24   A. A strong match is a match on -- let's me see.
25 I'm not completely familiar with that. I can tell you as

STATE OF TEXAS VS. ERIC H. HOLDER, JR., ET AL.   **1:11-CV-00128**
Gloria Martinez on 04/17/2012   **Pages 18..21**

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1   much as I remember --
2   Q.   Sure.
3   A.   -- but I'm not 100 percent on it.
4   MR. SWEETEN: Okay. We don't want you to
5   guess. Just give the information that you're -- that's
6   responsive to the question, that you know of.
7   A.   I know that there is a set of three or four
8   matching criteria. What exactly they are, I can't
9   remember them right now.
10   Q.   (BY MR. ROSENBERG) Who at the Secretary of State
11 would have that knowledge?
12   A.   Probably somebody in IT, in our IT department.
13   Q.   And is that -- are those criteria in written
14 form, as far as you know?
15   A.   I believe there is a document in there. However,
16 I don't know where it's located.
17   Q.   Does the T.E.A.M. database track whether people
18 voted or not?
19   A.   It can track that, yes.
20   Q.   When you say "it can track that," is that data
21 gathered?
22   A.   It is dependent upon user entry. So if the user
23 enters voting history, then the voting history is there to
24 be tracked.
25   Q.   And when you say "the user," to whom are you

Page 19

1   referring?
2   A.   Anybody that enters voting history. It could be
3   the county clerk's office. It could be the election
4   administrator's office. It could be the voter's
5   registrar's office, depending upon the county.
6   Q.   Is there a standard practice or procedure within
7   the Secretary of State in terms of inputting information
8   as to whether people voted?
9   A.   Yes.
10   Q.   And is that standard procedure in written form?
11   A.   That's a little difficult to answer. Do we have
12 the step-by-step written out somewhere?
13   Q.   Yes.
14   A.   I believe we do have -- like we send out an
15 e-mail periodically to all counties reminding them of the
16 processes. So that's the written form that I'm familiar
17 with.
18   Q.   Is there a specific field in the database that
19 captures whether or not -- a field or fields that capture
20 whether or not a person voted?
21   A.   Yes.
22   Q.   And what is that field called?
23   A.   The screen -- there are two screens where a user
24 can enter voting history. One screen is called record
25 voting activity. The other screen is called record poll

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1   book activity. And both allow the user to search for a
2   particular voter number or voter name, determine that it's
3   the right voter that they want to enter voting history
4   for, making sure that they choose the correct election,
5   whether it's early voting or election date, the date for
6   early voting and the polling place, and then they enter if
7   the ballot was accepted.
8   Q.   Does the T.E.A.M. database also then track the
9   mode of voting? And by that I mean in person, early
10 voting, absentee voting, provisional ballot, things like
11 that.
12   A.   It does have a place for each of those to be
13 entered into, yes.
14   Q.   And is there any special term or terminology to
15 describe those fields?
16   A.   Yes.
17   Q.   And what are they?
18   A.   For provisional ballots, there is a screen
19 specifically called provisional voting. There is a screen
20 for absentee ballots. It's a composite of -- well, it's a
21 series of four screens.
22   For regular absentee ballot, you have the
23 absentee ballot request. You've got the absentee ballot
24 sent screen. You've got the absentee ballot received
25 screen and the absentee ballot voted screen.

Page 21

1   There is an intermediary step in between the
2   absentee ballot request and the absentee ballot sent.
3   Technical issue that we had to put in, I don't know why.
4   But we have a step in there where we also are able to put
5   in a code of absentee ballot printed, and then it
6   automatically assigns absentee ballots sent to -- to the
7   particular voter. So that's absentee ballot.
8   The federal postcard applications follow all
9   those same screens except for the very first one. On
10 federal postcard application, we skip the absentee ballot
11 requested because the federal postcard application itself
12 is the request.
13   Q.   And -- I'm sorry, go ahead.
14   A.   I think that was all of them.
15   Q.   How about provisional ballots?
16   A.   There is a screen. Like I said, it's called
17 provisional voting. And it is in there so that the -- the
18 user can track that there was a provisional ballot
19 entered. Uh-huh.
20   Q.   And -- I'm sorry. Are you finished?
21   A.   Yes.
22   Q.   Is there also a field for early voting?
23   A.   Early voting, that would be the absentee ballot
24 mailed steps, because those fall into the category of
25 early voting.

Page 22

1   Now, if you want early voting in person --
2   Q. Yes.
3   A. -- those are the first two screens I was talking
4 about, the record voting activity and the record poll book
5 activity, where you can choose the mode of early voting.
6   Q. Are there -- does the T.E.A.M. database capture
7 information as to which precinct a voter is assigned to?
8   A. It is assigned to the voter record. It does
9 capture that information.
10   Q. And is there a specific term or terminology to
11 describe that field?
12   A. That information is assigned to each voter
13 according to their residence address. The residential
14 addresses are kept in the part of T.E.A.M., the online
15 T.E.A.M. program that's called street index.
16   And we also have a parcel index. And that's for
17 residence addresses that just have a concise description,
18 it doesn't follow the regular rules of a parsed address,
19 like 783 Main Street. Well, there are some addresses that
20 are just five miles west of Mile Marker 28, et cetera.
21   So both of those indexes, both of those indices,
22 are where the user will assign a certain range of
23 addresses to belong to a certain precinct and to belong to
24 certain jurisdictions. Whatever residential address or
25 parcel address falls in what has been entered in the

Page 23

1 in- -- index, that -- that voter will get assigned that
2 precinct and jurisdictions.
3   Q. By the way, is -- does the Secretary of State
4 maintain an archive of past snapshots of what the database
5 looked like?
6   A. I don't believe so. I really don't know what the
7 databases hold.
8   Q. Who would know that?
9   A. Probably somebody in IT.
10   Q. Do you know any names of any individual?
11   A. Probably Scott Brandt would be the one to direct
12 you to the right person.
13   Q. And what's Scott Brandt's title?
14   A. Well, all I know, he's the head of IT.
15   Q. I got it.
16   A. I don't know his title. Sorry.
17   Q. Is there a field that indicates the date that a
18 person registered to vote?
19   A. Yes.
20   Q. And would it be possible to use that field to get
21 a snapshot by pulling everything from X date?
22   A. I don't know what kind of a snapshot you're
23 asking about.
24   Q. Of-- of voters who are registered at -- on that
25 day.

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1   A. We have public information request method, and we
2 can certainly request a list of people who registered
3 between certain dates.
4   Q. Do you have an understanding of how much
5 compliance there is at the local level with entering data
6 into these fields concerning how people have voted, the
7 mode they voted? Is that something where you have a
8 hundred percent compliance or something less?
9   A. That -- that's hard to tell, because we're not
10 present at each of the counties looking at what -- how
11 people are voting, how many people are voting. We depend
12 on the county users to give us that information. So I
13 couldn't compare it.
14   Do I know that ten people went to vote at County
15 A and the county is actually telling me ten people voted?
16 I don't know.
17   Q. Do you have any understanding of how many fields
18 there are in the T.E.A.M. database?
19   A. I couldn't number them for you. Every screen is
20 different. There's many fields.
21   Q. Can you give me an estimate in terms of are we
22 dealing with more than a hundred or less than a hundred?
23   A. I'm sure there's more than a hundred.
24   Q. Are we dealing with more than 200?
25   A. I couldn't tell you.

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1   Q. Okay. So it's somewhat upwards of 100, as far as
2 you know?
3   A. As far as I can estimate.
4   MR. ROSENBERG: Let's have marked, Lindsey,
5 what was exhibit -- it was going to be, I think,
6 Exhibit 1. But let's call this Intervenor's Exhibit --
7   MS. STELCEN: This is going to be 5.
8   MR. ROSENBERG: For the court- -- yeah, we
9 can go to 5, I think, at this point.
10   MS. STELCEN: Yeah.
11   MR. ROSENBERG: And it's the voter record
12 layout.
13   MS. STELCEN: Yes, I have it. I'm putting
14 it in front of the witness right now.
15   MR. ROSENBERG: Great.
16   (Intervenor Exhibit 5 was marked.)
17   Q. (BY MR. ROSENBERG) Ms. Martinez, looking at
18 what's been marked as Intervenor's No. Exhibit 5, have you
19 ever seen that document?
20   A. Yes.
21   Q. And can you tell me -- can you identify for the
22 record, explain what this document is?
23   A. This voter record layout of company's PI
24 requests, or that is, public information request, to let
25 the requester know what they're getting in their file.

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1   Q. And have you seen this specific voter record
2 layout that's before you?
3   A. It looks the same as the ones we use every time
4 we give out a public information request.
5   Q. Were you involved in -- in any of the databases
6 that were provided to the United States or the defendant
7 intervenors in this action?
8   A. I was not.
9   Q. Going through this list here, under field name,
10 do you see that?
11   A. Uh-huh, yes.
12   Q. I'd like you just to tell me what each of these
13 fields mean, starting with the one that says Voter County
14 ID.
15   A. Voter County ID. That's a number that is
16 assigned to each county. Should be a three-digit number
17 as far as I'm familiar with.
18   Q. And how about juror ID?
19   A. Jury ID must be the -- no. Unless I can actually
20 see the data that it's -- that it is being assigned to, I
21 couldn't tell you for sure.
22   Here the field length says three. I think juror
23 IDs are longer than three digits, but it says three.
24   Q. So was your initial thought that this has to do
25 with the jury wheel?

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1   A. No. I -- I didn't even think that it had to do
2 anything with the jury wheel. But now that I see juror
3 ID, it must have some juror information in there.
4   Q. How about VUID?
5   A. That's the voter unique identif- --
6 identification number. That's a ten-digit number.
7   Q. And last name is I assume the last name of the
8 registrant?
9   A. Or whoever record it belongs to, yes, uh-huh.
10   Q. Because it might not be a registrant.
11   A. If it's not a registered voter then, that's
12 right, it would be whoever the jury ID belongs to.
13   Q. Does the database include records as to people
14 who applied for a registration but have not been granted
15 registrations?
16   A. Those that are waiting?
17   Q. Or rejected.
18   A. Or rejected.
19   I couldn't tell. I can't -- I use T.E.A.M., and
20 I don't have a way to call up rejected records, so I don't
21 know.
22   Q. SSN is Social Security number; is that correct?
23   A. Yes.
24   Q. Now, do you know what percentage of -- of names
25 in the database have Social Security numbers?

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1   A. I don't. I have no idea.
2   Q. Do you know how long Social Security numbers have
3 been collected in the database?
4   A. I don't know when they started to be required.
5 No, I don't know.
6   Q. Gender code is -- can you explain what that is?
7   A. That's always a -- optional. Male, female or
8 unspecified. But it's optional.
9   Q. And is the information self-reporting or filled
10 out by an official?
11   A. Self-reported.
12   Q. Official ID number. What is that?
13   A. Good question. I don't know what that official
14 ID number is. Different counties used to have their own
15 legacy number but we call that a legacy number. What
16 official ID number is referring to, I don't know.
17   Q. Date of birth is, I assume, date of birth of the
18 person about whom there's information?
19   A. And self-reported, yes.
20   Q. Voter status code, what is that?
21   A. That is a Code A for Active, S for Suspense, C
22 for Canceled. I believe FPCAs have an FPCA code.
23   Q. I'm sorry, you believe that who?
24   A. Yeah. FPCAs, federal postcard applicants --
25   Q. Yeah.

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1   A. They have a status of FPCA. Yeah. And, of
2 course, it can go to canceled, so...
3   Q. When -- A -- it would be A for active means what?
4   A. It means that the last time the voter registrar
5 sent a voter certificate to the address that they've got
6 for the voter, the card did not come back as undelivered
7 or undeliverable. So the voter registrar has to assume
8 that it reached the voter and, therefore, that the mailing
9 address, whatever they have for the voter, is correct.
10   Q. And S for suspense, what does that mean?
11   A. It means that the last time the voter registrar
12 sent a voter certificate to the mailing address they have,
13 it got returned as undeliverable, and a notice of address
14 confirmation is sent to the only address that the voter
15 registrar has. That notice of address confirmation is
16 eligible to be forwarded by mail, whereas the voter
17 certificate is not supposed to be forwarded by the post
18 office.
19   So once that notice of address confirmation
20 reaches the voter, we are hoping that the voter will
21 respond by giving the voter registrar their new mailing
22 address. But until that time or until they go vote and
23 give their new address at that time, until that time they
24 remain in suspension for about two federal election
25 cycles.

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1   Q. And then after two federal election cycles, what
2 happens?
3   A. If there's been no voting activity on behalf of
4 the voter and the voter has not given the voter registrar
5 their new address, after two federal election cycles, the
6 suspense record is canceled.
7   Q. So the S becomes a C?
8   A. Correct.
9   Q. And canceled includes anyone who is in suspense
10 who did not respond within the -- by two federal election
11 cycles. Is there anyone else under C?
12   A. Yes. Sometimes people request on their own to be
13 canceled. Sometimes people register in another county
14 and, therefore, the record in their previous county will
15 be automatically canceled. Sometimes a voter moves
16 outside of the State of Texas and registers in another
17 state. That state will give us notification, and then
18 their Texas record will be canceled.
19   There can also be reasons for new felonies that
20 the voter reg- -- that the voters don't deny or don't
21 respond to our request for finding out if they really, you
22 know, were charged with a felony. And if there's no
23 response in those 30 days or if they did get charged with
24 a felony, then they're canceled.
25   Records get canceled due to -- a deceased person,

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1 you know, can get their record canceled.
2   Q. And -- and are there fields that relate to these
3 cancellations in the T.E.A.M. database, meaning fields
4 relating to felonies, fields relating to deceased?
5   A. There are reasons that the users should be
6 selecting. If they select the correct reasons, then, yes,
7 they can track the various reasons that a record -- that
8 records were canceled in their county. For which the
9 records were canceled in their county, yeah.
10   Q. Hold on one second.
11   A. Sure.
12   Q. Can you explain to me what the FPCA designation
13 does? And -- and -- or actually, first tell me what the
14 code is for.
15   A. Federal postcard applications. We assign a
16 source code of 90 to that. I don't know --
17   Q. Ninety? The number 90?
18   A. 9-0. I don't know why we assigned it a 90. I
19 don't know. But it has a source code of 90. It gets
20 processed, we fill in the necessary information that we
21 get in the federal -- well, the users will enter that
22 information into the federal postcard application screen.
23 And it will automatically get assigned the source code of
24 90 because it is a federal postcard application, because
25 they use the screen for federal postcard application.

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1   Anything else?
2   Q. Are you familiar with a code L in the voter
3 status code database? Voter status code field?
4   A. L. I don't know if the background ever has an L.
5 I don't know.
6   Q. How about a code -- well, Code S -- a Code V as
7 in Victor?
8   A. No. No. Not currently. There's no code that
9 says V for voter in the status, no.
10   Q. All right. Going down this list, the last one
11 here says Spanish surname FG.
12   Can you tell me what that field is?
13   A. Spanish surname flag.
14   Q. Okay.
15   A. There is a box, I guess, that can be check marked
16 when -- when we're requesting public information -- when
17 we're going through the steps for requesting public
18 information report, and one of them says Spanish surname
19 flag.
20   And if they check mark that box, if the user, one
21 of us or the user check marks that box, then whatever
22 information is getting drawn out, if that record's surname
23 happens to fit the criteria from the Census Bureau as
24 being a Spanish surname or Hispanic surname, then it has
25 the flag of S for Spanish surname.

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1   Q. All right. Let me back up just a little so I
2 understand it.
3   I think you started by saying that when there's a
4 public information report that's done?
5   A. Yes.
6   Q. And then under what circumstances -- who requests
7 the public information report?
8   A. Public -- the public can request that. Sometimes
9 candidates request it. Yeah, it's mostly candidates,
10 peo- -- and -- and sometimes it's just other public --
11 people, the general public can request it.
12   Q. All right. So let's assume that a candidate
13 requests a public information report. What's the nature
14 of the request that typically leads to the generation of
15 Spanish surname information?
16   A. That would be up to the user. We usually
17 don't -- I'm sorry -- to the requester. We don't usually
18 ask the requester why they want the Spanish surname flag.
19   Q. Okay. And I understand that. My question really
20 wasn't you're asking why but rather the question itself is
21 typically a person saying, please provide me with Spanish
22 surname information?
23   A. Right. On the request they're able to tell us
24 whether or not they want the Spanish surname flagged. And
25 if they do, they'll -- that's part of one of their

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 1   requests so we carry it out.
 2       Q.  And that request is made typically to whom, to
 3   the county level or to the state level?
 4       A.  For those requesters that want information
 5   statewide, they'll usually come to the Secretary of
 6   State's office.  So we'll do that, our office will process
 7   that request.
 8           For those people just interested in a specific
 9   county, then they'll go to that particular county office,
10   the voter registrar's office usually, so that they can run
11   that request.
12       Q.  And so then I think you said that whoever is
13   responding to the request applies the criteria used by the
14   Census Bureau; is that correct?
15       A.  The user doesn't actually apply that.  It's in
16   the programming.  It's kind of built in.
17           Does that make sense?
18       Q.  So when the programming gets built in, your
19   understanding is, the criteria used by the census bureau
20   for determining a Spanish surname?
21       A.  That's my understanding.
22       Q.  And then when that report is issued, the data
23   from that report is then entered into this field, Spanish
24   surname flag?
25       A.  I'm not sure I understand that.  I can tell you
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 1   what it gives us.
 2       Q.  Why don't you tell me what it gives us.
 3       A.  So let's say that my name comes out in that, you
 4   know, bunch of people that are drawn out in the public
 5   information request, Gloria Martinez.  My name, my last
 6   name Martinez, will fit the criteria in the list of what
 7   the Census Bureau considers a Spanish surname.  So on my
 8   line of information, you'll have a flag that says S for
 9   Spanish surname.
10       Q.  One second, please.
11       A.  Uh-huh.
12           Or maybe it says Y for that particular column.
13       Q.  Ms. Martinez, are there more than one field that
14   deals with voter status?
15       A.  Not that I can recall right now, no, voter
16   status.
17       Q.  So are you aware of any field in the T.E.A.M.
18   database that has a value of V for Victor?
19       A.  Sorry, no, I'm not aware of it.
20       Q.  Now, looking at what is Intervenor Exhibit No. 5,
21   I think you testified earlier that there are more than a
22   hundred fields, so I assume that this does not comprise
23   the universe of fields; is that  correct?
24       A.  That's correct.
25       Q.  And I think you testified as to certain
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 1   categories of fields dealing with whether a person voted
 2   and the mode of voting and voter registration application
 3   date and whether the person is deceased, a few fields like
 4   that.
 5           Is that correct?
 6       A.  Will it say that they're deceased?  Well, I
 7   know -- I'm not sure about that very last statement where
 8   you included the word "deceased."
 9       Q.  Okay.  With exception to whether the person is
10   deceased.
11       A.  Everything else I would agree with.
12       Q.  Are there other categories of fields that come to
13   mind that we've not discussed and are not on Intervenor
14   List No. 5?
15       A.  Oh.  Well, there's -- well, I don't see on this
16   list in 5, I don't see mailing address.  And I know that's
17   a field in T.E.A.M.  So there could be more.
18       Q.  Uh-huh.
19       A.  Yeah.
20       Q.  Any others that come to mind?
21       A.  What about residential address?  I don't see it
22   here.  I don't see ZIP code.  I don't see the city,
23   residential city or mailing city or residential ZIP code,
24   mailing ZIP code.  I don't see -- there is even a box that
25   the user can identify if the voter did not check mark the
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 1   box that they did not have a TDL, ID or SSN, if they
 2   happen to not give any of those three IDs.  So that, I
 3   don't see it there.
 4       Q.  And -- and that's the -- the check on the
 5   application for -- for voter registration, correct?
 6       A.  Right.
 7           MR. ROSENBERG:  As a matter of fact, why
 8   don't we just get that marked.  Lindsey, I think it's --
 9           THE REPORTER:  It will be Intervenor 6.
10           MR. SWEETEN:  Ezra, I think this is probably
11   a good time to take a break.
12           MR. ROSENBERG:  Sure.
13           MR. SWEETEN:  Why don't we take about a
14   five-minute pause here.
15               (Break.)
16           MR. ROSENBERG:  Ms. Martinez, I just have a
17   couple more questions, and then I'll turn over the
18   questioning to the DOJ.
19       Q.  (BY MR. ROSENBERG)  Is there a document that
20   you've seen that contained -- that lists all of the fields
21   in the T.E.A.M. database?
22       A.  No.
23       Q.  Is it --
24       A.  Not that I know of.
25       Q.  Do you know whether it's possible to generate a
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1 document that lists all of the fields in the T.E.A.M.
2 database?
3   A. I -- I don't know what I would take to generate
4 something like that.
5   Q. Another question I have is, have you ever heard
6 of anything called a Live-Check database?
7   A. I know of a Live-Check process.
8   Q. What is the Live-Check process?
9   A. The process by which a voter record passes
10 verification.
11   Q. And when you say "the process by which a voter
12 registration passes verification," what do you mean?
13   A. Voter record -- sorry -- a voter application can
14 have voter identif- -- I'm sorry -- can have
15 identification numbers that the voter self-reports. For
16 example, Texas driver's license, Texas ID number, or
17 either a full or the last four digits of the Social
18 Security number. That, along with the information that
19 they provide as to their name, that can be verified as to
20 whether that information is indeed in the -- in the
21 driver's license database or the DPS database, that is, or
22 the Social Security Administration site that is given to
23 us to -- to check off of.
24   Q. And why -- is -- is Live-Check a -- the name of a
25 software, or is it a name of a database, or is it the name

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1 that the Secretary of State has applied to this process?
2   A. All I know is that the name of the process is
3 called Live-Check. I don't know why it's called that.
4   Q. I'm going to read you a paragraph which I'll
5 represent comes from the Answers to Interrogatories that
6 the State has provided us.
7   It says: The office of the Secretary of State
8 has access to and utilizes the Live-Check database
9 maintained by the Department of Public Safety containing
10 data reflecting the identification of Texas residents who
11 possess a valid driver's license or Texas personal
12 identification card issued by the Texas Department of
13 Public Safety. The Live-Check database includes the
14 following fields of data: Name, address, driver's license
15 number, date of birth, Social Security number.
16   Is that -- having read that, is that the same
17 thing you're talking about when you talk about Live-Check
18 process?
19   A. Yes.
20   Q. Now, they -- this answer referred to it as a
21 Live-Check database. So I guess my question is, are the
22 results of the process somehow captured and kept in a
23 database?
24   A. That -- the results of the process, is it
25 captured and kept in a database?

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1   Q. And just to be clear, Ms. Martinez, what I'm
2 trying to do is reconcile -- you're saying it's called a
3 Live-Check process with the Answers to Interrogatories
4 that we have refers to a Live-Check database, so I'm
5 trying to see if we're talking about the same thing.
6   A. I honestly don't know the names they give to the
7 different databases. If they're calling the database that
8 we used the Live-Check process, if they're calling it
9 Live-Check database, then, okay, but I don't know what
10 they call it.
11   Q. Who at the Secretary of State's office would have
12 information about the Live-Check database?
13   A. What part of the -- well, any database, I'm
14 thinking IT would know more about that?
15   Q. Scott Brandt?
16   A. Yes, he'll -- he would be in charge of IT, yes.
17   MR. ROSENBERG: Okay. I don't have any
18 further questions right now.
19   EXAMINATION
20 BY MS. WESTFALL:
21   Q. Hi. This is Elizabeth Westfall.
22   A. Hi.
23   Q. Are -- are you ready for us?
24   A. Sure.
25   Q. Great. My name is Elizabeth Westfall. I

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1 represent defendant, Eric Holder, in this litigation. I'm
2 going to ask you a few additional questions about the
3 T.E.A.M. database.
4   A. Very well.
5   Q. First of all, were you -- did you have any
6 involvement in producing the copies or extracts of the
7 T.E.A.M. voter registration database of the United States
8 as part of this lawsuit?
9   A. No.
10   Q. And are you aware that before this lawsuit was
11 filed, the State of Texas asked the Department of Justice
12 to preclear its photo ID law through an administrative
13 process under the Voting Rights Act?
14   A. I was made aware of it, yes.
15   (Sotto voce conversation.)
16   Q. (BY MS. WESTFALL) Are you -- so you are aware
17 that there was an administrative process before this
18 lawsuit; is that correct?
19   A. I don't know what you mean by "administrative
20 process," but I know that the SB14 bill has to go through
21 preclearance.
22   Q. And did you have any involvement in respon- -- in
23 participating in that administrative process to seek
24 preclearance of Texas' photo ID law?
25   A. No.

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1   Q. Ms. Martinez?
2   A. Yes.
3   Q. Did -- did you -- did you hear that question?
4   A. Yes. I responded that I was not involved in that
5 piece of preclearance and the information gathering.
6   Q. Thank you.
7   Are there certain counties in Texas -- actually,
8 are there -- strike that.
9   Are there 39 counties in Texas that do not -- are
10 not directly linked with the T.E.A.M. database?
11   A. Correct.
12   Q. How do those 39 counties input their information
13 into the T.E.A.M. database?
14   A. They upload their files on a daily basis to the
15 Secretary of State's office.
16   Q. Do you know whether there is a database
17 dictionary for the T.E.A.M. database?
18   A. No. Not that I'm aware of, no.
19   Q. Is there a manual for the database?
20   A. Not that I'm aware of. A manual, no.
21   Q. How do you know how to operate the database?
22   A. I don't operate the database. I use the T.E.A.M.
23 online interface program.
24   Q. Who does operate the database?
25   A. I suppose -- well, I really don't know about the

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1 word "operate," but IT is the only one --
2   Q. Who maintains the database?
3   A. Depends on what you mean by "maintain." The
4 users, the county users that enter voter information keep
5 inputting information into the database that --
6   Q. Who in your office maintains the T.E.A.M.
7 database, in your perspective?
8   MR. SWEETEN: Objection; asked and answered.
9   Go ahead.
10   Q. (BY MS. WESTFALL) You may answer.
11   MR. SWEETEN: You can answer, if you know.
12   A. The only thing I can think of is IT.
13   Q. (BY MS. WESTFALL) And who is the person in
14 charge of that department?
15   A. Scott Brandt.
16   Q. To your knowledge, does he have any manual or
17 instructions on how to -- how to maintain or operate the
18 T.E.A.M. database?
19   MR. SWEETEN: Objection; asked and answered.
20   You may answer.
21   Q. (BY MS. WESTFALL) You may answer.
22   A. Not that I know of.
23   Q. If the Secretary of State wanted to change a
24 field name in the T.E.A.M. database, who would implement
25 that change?

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1   A. The request would be made by the elections
2 division, the -- it would be carried out by the IT
3 department.
4   Q. And how is information gathered and put into the
5 database from voters?
6   A. The voters fill out the voter application. The
7 online users use the T.E.A.M. online information to enter
8 in that information. The off-line counties enter it into
9 whatever platform they use in their counties. They create
10 the file that then gets uploaded to Secretary of State's
11 office.
12   Q. And -- and your role, again, is to interface
13 with -- with the users which are counties; is that
14 correct?
15   A. Correct.
16   Q. Okay. Turning your attention back to an exhibit
17 that's previously been marked Intervenor No. 5.
18   A. Yes.
19   Q. It's entitled "Voter Record Layout." Could you
20 refer -- refer to that exhibit, please.
21   A. I've got it in front of me.
22   Q. I believe you testified earlier that you weren't
23 quite certain of what the first field on the left meant,
24 "voter county ID"; is that correct?
25   A. Correct.

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1   Q. Directing your attention all the way over to the
2 right of that field, do you see where it says "Internal
3 database key" under "Comments"?
4   A. Correct.
5   Q. Does that refresh your recollection at all of
6 what this field means?
7   A. I could answer better if I had the actual
8 information that it's referring to. The only thing I know
9 is that the voter county ID number is three digits long.
10 But here the field length is ten. I don't know why, then.
11 I don't know.
12   Q. Well, if I represent to you that the database
13 that the United States has received from your office has
14 voter county ID that generally has the field length of
15 seven or eight numbers, does that refresh your
16 recollection?
17   A. No. No.
18   Q. Would it refresh your recollection if I told you
19 that the first digit is always one?
20   A. No, not at all. I have no clue.
21   Q. Do you know who in your office would be able to
22 tell us what this field name refers to?
23   A. The personal that created it. Someone in IT.
24   Q. Who do you think created this document?
25   A. I think that it's from your first -- from the

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1 first information that was gathered and given to y'all for
2 preclearance. And as far as I know, it was only the
3 people in IT that were asked to gather the information.
4   Q. Okay. Well, turning your attention again to
5 Exhibit No. 5, do you see on the upper right-hand side
6 there is a date of 3/28/2012?
7   A. Yes.
8   Q. Does that cause you have to any other conclusion
9 about when this document was generated and the office that
10 generated it?
11   MR. SWEETEN: Objection; calls for
12 speculation.
13   Q. (BY MS. WESTFALL) You may answer.
14   A. Yes, I don't know what it would have been created
15 for.
16   Q. But does it make you reconsider your conclusion
17 that this was created during a preclearance period, given
18 the date on this document?
19   MR. SWEETEN: Objection; asked and answered.
20 Objection; calls for speculation.
21   Q. (BY MS. WESTFALL) You may answer.
22   A. Was I wrong in thinking that --
23   MR. SWEETEN: Just answer her question.
24 She's asked you her question. If you can answer it...
25   A. I don't know what this document was created for.

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1   Q. (BY MS. WESTFALL) Okay. Thank you.
2   So do you see under the column entitled "Field
3 Name," it says "Juror ID"?
4   A. Yes.
5   Q. Could you testify -- or could you tell me,
6 please, what that field indicates?
7   A. I can tell you what it appears to be, to me.
8   Q. Okay. Please do so.
9   A. It appears to be juror ID. Could it be
10 jurisdiction ID? Yes. I don't know what that field name
11 really means. I wasn't the one that created the file, so
12 I don't know what --
13   Q. I'm going to turn your attention again to the
14 left-hand side, you know, corresponding to juror ID where
15 it says "County Number." Do you see that?
16   A. Tell me again, on the line where juror ID is?
17   Q. Right. If you just follow it all the way over to
18 the right under "Comments," do you see it says "County
19 Number."
20   A. County number.
21   Q. I'm sorry. Did you say yes?
22   A. Yes, I see where it says "County Number."
23   Q. Does that refresh your recollection as to what
24 this field is?
25   A. I can only guess at it.

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1   Q. And what -- what is your guess?
2   A. That it does not mean juror ID, but, rather,
3 jurisdiction ID.
4   Q. Okay. And who do you think would know for sure
5 what this field name means?
6   A. Whoever created the document.
7   Q. Okay. And then underneath, it says "VUID."
8   Is that correct?
9   A. Yes.
10   Q. And could you tell me what that field means?
11   A. It stands for voter unique identification.
12   Q. How is that number assigned?
13   A. How is that number signed?
14   Q. Assigned.
15   A. Assigned. The T.E.A.M. program automatically
16 assigns voter unique identification number, ten-digit
17 number, to each record that it processes.
18   Q. And that is assigned at the state level in the
19 state T.E.A.M. database and not at the county level; is
20 that correct?
21   A. That is correct.
22   Q. Okay. Then going down the list down to official
23 ID number. I believe that you earlier testified that you
24 didn't know what that field means; is that correct?
25   A. That is correct.

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1   Q. If I told you that in the document in the
2 database that we received that field length is usually
3 eight numbers, would that refresh your recollection in any
4 way?
5   A. I can guess as to what that means.
6   Q. Tell me what you think it means.
7   A. I think it stands for the legacy number or the
8 old voter number that used to be assigned by each
9 individual county to a voter.
10   Q. I see. And do counties still assign an
11 individual number to a voter today?
12   A. Some do.
13   Q. And by "legacy," do you mean the county numbers
14 before there was a T.E.A.M. statewide voter registration
15 database?
16   A. That is correct.
17   Q. When did the database come into existence?
18   A. January of 2007.
19   Q. I'm sorry. The statewide did?
20   A. When we started to implement the T.E.A.M. program
21 is January 2007.
22   Q. Did you not have -- did Texas not have a
23 statewide voter registration database prior to
24 January 2007?
25   A. They did have one. It just wasn't through

STATE OF TEXAS VS. ERIC H. HOLDER, JR., ET AL.   1:11-CV-00128
Gloria Martinez on 04/17/2012   **Pages 50..53**

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1   T.E.A.M.
2   Q. I see. What was that database called?
3   A. I -- hum. I don't know if they named the
4   databases something different. The program that the voter
5   registrars used was different. I know the initials to
6   that.
7   Q. So turning back to the -- the official ID number,
8   are those numbers not unique because the counties
9   individually create them?
10   A. That was the reason for creating the VUID number,
11 correct, because -- because there could be duplication of
12 numbers from one county to the next.
13   Q. And are the official ID numbers, those were
14 numbers that might have been in use even before there was
15 a statewide voter registration database T.E.A.M. -- called
16 T.E.A.M. or a different database; is that correct?
17   A. Could they have been? It's possible. I don't
18 know.
19   Q. And under that field "Voter Status Code," the
20 database that's been produced to the United States, I'll
21 represent to you, includes a code of Z.
22   A. Okay.
23   Q. Do you know what that would stand for?
24   A. I'd -- I'd have to look back in my notes. If
25 you've got that information, then...

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1   I'd have to go back to my office and find out,
2   but...
3   Q. Would there be documents that you could look at
4   to determine what that code means in your office?
5   A. I could compare it to other public information
6   requests that were given, and I could make that
7   determination then.
8   Q. If I told you that the majority of records have a
9   voter status code of V, does that change your answer in
10 any way?
11   A. I'd -- I'd still be guessing as to what the V
12 meant.
13   Q. Okay. Turning your attention to the Spanish
14 surname field about which you testified to earlier.
15   A. Yes.
16   Q. Could you tell me how -- could you describe again
17 how that field works?
18   A. To the best of my knowledge, the surname that a
19 voter record has is compared against the list of surnames
20 that the Census Bureau -- I don't know what year -- that
21 the Census Bureau has declared as being a Hispanic surname
22 or a Spanish surname. And if it matches that list, then
23 it is coded as yes, as being a Spanish surname.
24   Q. I see. And is this sort of matching process and
25 identification of Spanish surname voters done at the

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1   Secretary of State's level rather than the county?
2   A. Correct.
3   Q. And this is not in any way -- it does not in any
4   way relate to anything a voter puts on a voter
5   registration application; is that correct?
6   A. Aside from just self-reporting their surname,
7   correct.
8   Q. Thank you.
9   And who in your office would be the one who would
10 have the most knowledge about the Spanish surname field?
11   A. IT.
12   Q. And who in IT? Is there a particular individual?
13   A. I'd have to say that Scott Brandt would be best
14 to direct you to that particular person.
15   Q. Have you seen any manuals or publications that
16 describe this matching process or describe the Spanish
17 surname database?
18   A. I have not.
19   Q. Okay. One moment.
20   A. Uh-huh.
21   Q. How do you know that the Spanish surname list
22 comes from the census?
23   A. I believe it's anecdotal information. This is
24 the information that I was given by my supervisor in the
25 past. It was just in talking. That's all.

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1   Q. Do you know how long this field has appeared in
2   the T.E.A.M. database?
3   A. Sorry, no, I don't.
4   Q. Has it been in the database since you have been
5   employed with the office?
6   A. Yes. For as long as I've been in the office,
7   I've always seen this field.
8   Q. And would that be six years or longer?
9   A. I've been in there six years.
10   Q. Do you know whether there are any keys to the
11 database that would list the voting -- voter county IDs or
12 juror IDs?
13   A. I don't know what you mean by "keys."
14   Q. I guess -- I'm going to strike that question.
15   Are there any cross-reference tables that would
16 list voter county ID or jury ID or voter status codes?
17   A. Sorry, no, not that I know of.
18   MS. WESTFALL: And I'm not sure who is
19 defending this deposition. Is it Mr. Sweeten?
20   MR. SWEETEN: It is.
21   MS. WESTFALL: Have you searched for and
22 produced any such tables or manuals or database
23 dictionaries that relate to the T.E.A.M. database?
24   MR. SWEETEN: I -- you know, I'll -- that's
25 something I'll talk with Matt about, Elizabeth.

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1   MS. WESTFALL: Okay. Very good.
2   One moment.
3   Q. (BY MS. WESTFALL) Is there any information in
4   the database about Texas residents who have been
5   determined by the United States Department of Veterans
6   Affairs to have a disability rating of at least 50
7   percent?
8   A. A voter registration database?
9   Q. Correct.
10   A. We've never asked that information before. I
11 would say no.
12   Q. And is there any information in the T.E.A.M.
13 database about voters who have been found by the Social
14 Security Administration to have a disability?
15   A. I would also say no.
16   Q. Is there a driver license number field in the
17 T.E.A.M. database?
18   A. Driver's license numbers are kept in the
19 database, yes.
20   Q. They are? And what is the name of that database?
21 I mean, that field? I'm sorry.
22   A. I -- I don't know what they named the field.
23   Q. And is it -- is it -- is that information in one
24 field or more than one field?
25   A. Oh, I don't know about that either. Huh-uh.

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1   Q. And if I wanted to match a voter record to a
2   driver license record and that individual had supplied a
3   driver's license number, how would I do that?
4   A. That's -- in -- those are searches that I don't
5   ever do. I can do a voter search in T.E.A.M. Online, and
6   there is a field for driver's license. I can enter it
7   there and if it matches the voter, then it will bring up
8   that record.
9   Q. So if I wanted to do a search where I was
10 matching every voter record to a driver license record
11 using -- how would I do that?
12   A. I can only search in the voter registration
13 database through the T.E.A.M. Online program. There's
14 only -- the -- the screen is called Voter Search. So you
15 would --
16   Q. Is there someone who -- who matches fields in the
17 voter registration T.E.A.M. -- T.E.A.M. database with the
18 driver's license database?
19   A. I'm not sure what -- what the purpose of your
20 question is.
21   Q. I guess I just want to know whether there's
22 someone who knows how to compare fields in the T.E.A.M.
23 voter registration database to the state driver's license
24 database to see if they're matching entries. Is there
25 someone in your office who does that?

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1   A. All that background kind of working, working with
2   the databases, that has to be done by IT.
3   Q. Would that be the same individual who you
4   identified earlier in this deposition?
5   A. Yes.
6   Q. Scott -- I'm forgetting his last name?
7   A. Brandt.
8   Q. Brandt.
9   What is his title?
10   A. I'm sorry, I don't know his title. I know he's
11 the head of the IT department.
12   Q. Thank you.
13   Just give me one minute?
14   A. Uh-huh.
15   Q. So what fields --
16   MR. ROSENBERG: Ms. Westfall, it's Ezra
17 Rosenberg. Just for -- we have to vacate this conference
18 room and go to a different conference room. So if you're
19 going to continue, do you mind if we just take a
20 few-minute break and we'll -- we'll even get back in five
21 minutes?
22   MS. WESTFALL: You know what, I have about
23 two more questions and then I can be done. Can you bear
24 with me, or do you need --
25   MR. ROSENBERG: Sure, sure. Go ahead.

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1   Q. (BY MS. WESTFALL) Is there -- could you identify
2   the fields that would constitute the mailing address in
3   the T.E.A.M. database?
4   A. That's as far as my identification goes, just to
5   tell you that there are fields that say -- that keep the
6   mailing address.
7   Q. Okay. And is the residential address the same
8   from the mailing address in the voter registration
9   database?
10   A. If it's -- is the --
11   Q. Is the residential address distinct from the
12 mailing address in the voter registration database?
13   A. Only if the user really means to create a
14 different mailing and residential -- and residential
15 address.
16   Q. Thank you.
17   MS. WESTFALL: I don't think I have any
18 other questions at this time.
19   MR. ROSENBERG: I don't either, other than
20 just to say that I think there are areas that we think are
21 fairly within this 30(b)(6) that have not fully been
22 responded to through this witness and we certainly are
23 reserving our right, leaving this aspect of the 30(b)(6)
24 open for further depositions, but we don't have to deal
25 with that issue now.

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Gloria Martinez on 04/17/2012   **Pages 58..61**

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1   MR. SWEETEN: What -- what specific areas
2   are those, Ezra?
3   MR. ROSENBERG: Well, I can go through a
4   whole laundry list, but if so, I'm going to have to go to
5   a different room.
6   But there were any number of areas where
7   Ms. Martinez testified that the person with more knowledge
8   on it would be in IT and specifically, Scott Brandt; and
9   we certainly would reserve our rights to pursue that --
10 those lines of questioning.
11   MR. SWEETEN: Okay. The deposition --
12   MR. ROSENBERG: I think it's best we adjourn
13 just for five minutes and we'll -- in the meantime you can
14 get the next witness and we'll go into a different
15 conference room.
16   MR. SWEETEN: Okay. We'll convene in five
17 minutes.
18   (THE DEPOSITION CONCLUDED AT 2:57 P.M.)
19
20
21
22
23
24
25

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1   CHANGES AND SIGNATURE
2   PAGE LINE   CHANGE   REASON
3   _____
4   _____
5   _____
6   _____
7   _____
8   _____
9   _____
10 _____
11 _____
12 _____
13 _____
14 _____
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22 _____
23 _____
24 _____
25 _____

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1   I, GLORIA MARTINEZ, have read the foregoing
    deposition and hereby affix my signature that same is true
2   and correct, except as noted above.
3
4
5   _____
                GLORIA MARTINEZ
6
7   THE STATE OF _____)
    COUNTY OF _____)
8
            Before me, _____, on this
9   day personally appeared GLORIA MARTINEZ, known to me (or
    proved to me under oath or through
10 _____) (description of identity card
    or other document)) to be the person whose name is
11 subscribed to the foregoing instrument and acknowledged to
    me that they executed the same for the purposes and
12 consideration therein expressed.
            Given under my hand and seal of office this
13 _____ day of _____, _____.
14
15
16   _____
                NOTARY PUBLIC IN AND FOR
                THE STATE OF _____
17   COMMISSION EXPIRES: _____
18
19
20
21
22
23
24
25

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1   IN THE UNITED STATES DISTRICT COURT
               FOR THE DISTRICT OF COLUMBIA
2   )
3   STATE OF TEXAS,   )
)
4   Plaintiff,   )
)
5   )
    VS.   )
6   ) CASE NO: 1:11-CV-00128
) RMC-DST-RLW
7   ERIC H. HOLDER, JR., IN   )
    HIS OFFICIAL CAPACITY AS   )
8   ATTORNEY GENERAL OF THE   )
    UNITED STATES,   )
9   )
       Defendant,   )
10   )
)
11 ERIC KENNIE, ET AL.,   )
)
12   Defendant-Intervenors,)
)
13   )
    TEXAS STATE CONFERENCE OF)
14 NAACP BRANCHES, ET AL.,   )
)
15   Defendant-Intervenors,)
)
16   )
    TEXAS LEAGUE OF YOUNG   )
17 VOTERS EDUCATION FUND, ET)
    AL.,   )
18   )
       Defendant-Intervenors,)
19   )
    TEXAS LEGISLATIVE BLACK   )
20 CAUCUS, ET AL.,   )
)
21   Defendant-Intervenors,)
)
22 VICTORIA RODRIGUEZ, ET   )
    AL.,   )
23   )
       Defendant-Intervenors.)
24
25

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1   REPORTER'S CERTIFICATION
         DEPOSITION OF GLORIA MARTINEZ
2   April 17, 2012

3

4   I, Tamara K. Chapman, Certified Shorthand Reporter in

5   and for the State of Texas, hereby certify to the

6   following:

7   That the witness, GLORIA MARTINEZ, was duly sworn by

8   the officer and that the transcript of the oral deposition

9   is a true record of the testimony given by the witness;

10   That the deposition transcript was submitted on

11   _____ to the witness or to the attorney for

12   the witness for examination, signature and return to me by

13   _____ ;

14   That the amount of time used by each party at the

15   deposition is as follows:

16   MR. ROSENBERG - 00:57

17   MS. WESTFALL - 00:27

18   MR. SWEETEN - 00:00

19   MS. PÉREZ - 00:00

20   MS. PERALES - 00:00

21   MR. JOHNSON - 00:00

22   MS. MURPHY - 00:00

23   That pursuant to information given to the deposition

24   officer at the time said testimony was taken, the

25   following includes counsel for all parties of record:

Page 63

1   Mr. Patrick Sweeten - FOR THE PLAINTIFF STATE OF

2   TEXAS

3   Ms. Myrna Pérez - FOR TEXAS NAACP STATE CONFERENCE

4   AND THE MEXICAN AMERICAN LEGISLATIVE CAUCUS

5   Ms. Elizabeth S. Westfall - FOR THE DEFENDANT ERIC H.

6   HOLDER, JR., IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL

7   OF THE UNITED STATES

8   Mr. Ezra D. Rosenberg - FOR DEFENDANT INTERVENORS

9   TEXAS STATE CONFERENCE OF NAACP BRANCHES AND THE MEXICAN

10   AMERICAN LEGISLATIVE CAUCUS OF THE TEXAS HOUSE OF

11   REPRESENTATIVES

12   Mr. Gregory K. Johnson - FOR THE TEXAS LEAGUE OF

13   YOUNG VOTERS EDUCATION FUND:

14   Ms. Kathleen T. Murphy - FOR THE DEPARTMENT OF PUBLIC

15   SAFETY

16   Ms. Nina Perales - FOR VICTOR RODRIGUEZ, NICOLE

17   RODRIGUEZ, SOUTHWEST VOTER REGISTRATION EDUCATION PROJECT,

18   MI FAMILIA VOTA EDUCATION FUND:

19   I further certify that I am neither counsel for,

20   related to, nor employed by any of the parties or

21   attorneys in the action in which this proceeding was

22   taken, and further that I am not financially or otherwise

23   interested in the outcome of the action.

24

25

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1   Certified to by me 18th day of April, 2012.

2

3   _____

4   Tamara K. Chapman, Texas CSR 7248
     Expiration Date: 12/31/12
     Huseby
5   7000 North Mopac Expressway, 2nd Floor
     Austin, Texas 78731
6   512.687.0424
     Firm Registration No. 660

7

STATE OF TEXAS VS. ERIC H. HOLDER, JR., ET AL.   1:11-CV-00128
Gloria Martinez on 04/17/2012   Index: 08540-6531..Administration

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